

	<p style="text-align: center;">SUBMISSION</p> <p style="text-align: center;">on the accommodation needs of adult victims of sex trafficking in Ireland</p> <p style="text-align: right;">September 2014</p>
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This submission is intended for the attention of the Minister for Justice and Equality with a view to inform the Minister's decision in relation to the future accommodation of victims of trafficking for the purposes of sexual exploitation in Ireland. It presents the necessity for review and amendment of the current arrangements for housing of victims of trafficking and proposes practical solutions which could be considered by the Department of Justice and Equality as part of the upcoming consultation on the new National Action Plan for Combatting and Preventing Trafficking and Human Beings.

SUMMARY

Trafficking of human beings for the purposes of sexual exploitation is the predominant form of trafficking crime in Ireland. Judging by the annual number of detected victims and investigations, it is evident that sex trafficking accounts for three quarters of this crime. The provision of safe and appropriate housing is an internationally agreed priority need for victims, which is central to their recovery and to fulfilling their role as witnesses. The first Irish National Action Plan acknowledges this need as a priority.

Presently in Ireland, the combination of two policies, the use of Reception and Integration Agency for accommodation of victims of human trafficking on the one hand and the policy of restricting the granting of designated **recovery** permits to such victims on the other result in unsafe inappropriate arrangements for victims. In the focus of concern fall primarily **victims of trafficking for sexual exploitation, who await formal identification**. Very few, if any, detected victims of trafficking are identified in Ireland, and thus obtain the right to recover from their ordeal in privacy and security. The vast majority of victims remain for considerable periods of time unidentified and living in direct provision hostels, which have been deemed nationally and internationally substandard for the needs of victims of trafficking, especially women who have been sexually exploited. It is essential that these victims, whose experiences in many cases have triggered important criminal investigations, get the chance to reflect and recover in safe, private and secure accommodation and cooperate with the authorities without any fear or pressure associated with the role of a witness. Nationality and immigration status must be irrelevant with regard access to safe accommodation for such victims of crime.

This document proposes solutions for housing of this category of victims, which is based on the practical experiences and recommendations of specialised non-governmental service providers who work in the anti-trafficking area as well as by the opinion of relevant housing providers in Ireland who have been consulted.

The present proposal endorses the **decentralised combined model of accommodation**, where detected victims could avail of a range of accommodation types, such as shelters, specifically rented units, using a small portion of the capacity of housing providers who specialise in supported safe housing for vulnerable women and young people. The proposed approach offers more flexibility in accommodation of victims with different profile, i.e. single women, women with children and aged out minors. It also offers a better guarantee of confidentiality and security, in view of the stigma associated with trafficking for commercial sexual exploitation and the potential risks to their safety on the part of traffickers and pimps who'd be aware of the evidence the victim could provide on their crimes. With respect to its concept and implementation, the recommended model utilises existing competence and resources in Ireland and supports the enhanced cooperation between **State and non-governmental service providers** in ensuring the recovery of the victims of human trafficking and their preparation as potential witnesses.

Introduction

The selection of the Reception and Integration Agency (RIA) centres for the purposes of accommodation of victims of trafficking, in particular vulnerable female victims who have been subjected to sexual violations as part of the trafficking crime, has encountered numerous objections over the last few years. In view of the fact that the international monitoring of Ireland has been complete, and a new national action plan is underway, there is presently an opportune moment in time to review these accommodation arrangements. The submission aims at exploring the situation regarding accommodation of victims of trafficking for sexual exploitation in Ireland. The document also proposes solutions for housing such victims, which is based on the practical experiences and recommendations of specialised non-governmental service providers who work in the anti-trafficking area as well as by the opinion of relevant housing providers in Ireland who have been consulted.

Ireland is a country of destination and transit for victims of trafficking. This has been acknowledged by the annual US State Department's Trafficking in Persons report as early as 2006¹ and has been re-confirmed by a range of international monitoring reports since. In 2008 Ireland introduced the Criminal Law (Human Trafficking) Act and in 2009 the Department of Justice published a first of its kind National Action Plan for Preventing and Combating Trafficking in Human Beings (NAP) outlining the measures of response to this crime, including the protection of its victims in the period 2009-2012. This NAP identified the housing needs of victims of trafficking as a foremost priority:

"Access to safe accommodation for suspected victims of human trafficking is a key priority of this Plan"²

This statement fully complies with the requirements of the international and EU treaties Ireland is a party to. In that regard, Article 12(1a) of the Council of Europe Convention on Action against Trafficking in Human Beings (CoE Convention) provides that each country shall adopt measures to ensure the physical, psychological and social recovery of the victims and that such measures shall include at least "Standards of living capable of ensuring their subsistence, through such measures as: appropriate and secure accommodation, psychological and material assistance."³ Similarly, Article 6 (3a) of the UN Protocol to Prevent, Suppress and Punish the Trafficking in Persons, Especially Women and Children provides that the signatories shall consider the implementation of a set of measures for assistance and "in particular, the provision of appropriate housing" for victims.

More recently, the Directive of the European Parliament and of the Council establishing minimum standards on the rights, supports and protection of victims of crime, which Ireland opted into, highlighted the need for services as a 'minimum' to develop and provide:

- (a) Shelters and any other appropriate interim accommodation for victims in need of a safe place due to an imminent risk of secondary and repeat victimisation, of intimidation and of retaliation;
- (b) Targeted and integrated support for victims with specific needs, such as victims of sexual violence, victims of gender-based violence and victims of violence in close relationships, including trauma support and counselling.⁴

¹ US State Department Trafficking in Persons Report

² DJE National Action Plan to Prevent and Combat Trafficking in Human Beings 2009-2012

³ CoE Convention on Action against Trafficking in Human Beings CETS 197 Article 1(b)

⁴ Directive 2012/29/EU Article 9

Current policy of accommodation of victims of trafficking and the surrounding national debate

While the priority for access to safe accommodation for victims is very welcome as a statement in the NAP, the intentions of this statement are not being implemented in practice in Ireland. The combination of two policies, the policy to use RIA accommodation for victims of severe crime of sexual nature on the one hand and the policy to restrict the conferring of designated **recovery** permits on victims of trafficking on the other, result in the present unsafe inappropriate arrangements, as will be explained below.

The NAP, which to date remains the only strategic plan adopted in the area of human trafficking, together with its subsequent review document compiled by the Anti-Human Trafficking Unit at the Department of Justice and Equality (AHTU), established the current framework of the provision of housing to victims of trafficking. The current policy is as follows:

“The arrangements for accommodation, which are now in place insofar as adult potential or suspected victims of trafficking are concerned, are that the Reception and Integration Agency (RIA) – a functional unit of the Irish Naturalisation and Immigration Service (INIS) of the Department of Justice, Equality and Law Reform - in conjunction with the Health Service Executive (HSE) is providing services to potential or suspected victims of trafficking referred to them by GNIB. Potential or suspected victims of trafficking are provided with the same accommodation and ancillary services as those provided to newly arrived asylum seekers.”

In its full version, the NAP further elaborates on the rationale for this decision by pointing out that “RIA already has a package of supports for asylum seekers in place and is sufficiently experienced and flexible to meet the needs of potential/suspected victims of trafficking.”

A formal review of the NAP was carried out in 2011 and not for the first time the accommodation situation was criticised by many civil society organisations in Ireland representing different perspectives: safety, privacy, re-victimisation, children and young people’s safety, accessibility for pimps and traffickers, propositioning of female residents for prostitution, sexualisation of younger residents and other considerations, which are detailed further down. A widely publicised report by AkidWa in 2010 concluded that the direct provision system is inadequate for catering for women who have been subjected to rape, sexual violence and other types of violence because of its lack of gender sensitivity.⁵ Similarly, the Immigrant Council of Ireland’s report “Asylum Seeking Victims of Trafficking: Legal and Practical Challenges”⁶ analysed the unsuitability of direct provision for housing of victims of severe crimes. Nevertheless, the State responded that the system of RIA accommodation would continue and that ‘arguments made in relation to general allegations about, for example grooming and prostitution have not been substantiated’. Recent media coverage showed, however, that there is in fact substantiated evidence of such. A recent series on RTE Radio 1 highlighted the extent to which prostitution takes place both in and directly outside Direct Provision Centres.⁷

Within the national debates on this issue, it must be pointed out that the focus of concern justifiably falls on the **victims of trafficking for sexual exploitation, who await formal identification**, and who do not have the benefit of the designated permits for suspected victims of this crime, namely a Recovery and

⁵ Akidwa 2010, *Am only Saying it Now: Experiences of Women Seeking Asylum in Ireland*

⁶ Immigrant Council of Ireland 2011, UN.Gift sponsored report http://www.immigrantcouncil.ie/images/stories/18.11.2011UN_Gift_report.pdf

⁷ Brian O’Connell interviewed several female asylum seekers who stated that many women, particularly young single mothers, in direct provision feel forced into prostitution. <https://soundcloud.com/todaysor/brian-oconnell-on-direct-provision>

reflection permit and a renewable Temporary residence permit⁸.

Trafficking of human beings for the purposes of sexual exploitation is the predominant form of trafficking crime in Ireland as anywhere else in Europe. Judging by the number of detected victims and investigations annually sex trafficking accounts for three quarters of this crime in Ireland.⁹

The decision to accommodate (potential) victims of trafficking pending their formal identification by an authorised high-ranking officer under the Administrative Immigration Arrangements has to be considered with reference to the established fact that very few victims of trafficking, if any, are eligible to receive a Recovery and Reflection permit for 60 days and subsequently a renewable Temporary permission permit for victims of trafficking which allows them to move out of direct provision and into privately rented accommodation and access to social welfare.¹⁰ The Administrative Immigration Arrangements preclude victims who are EEA nationals, asylum seekers or holders of any type of immigration permit in the State from the possibility to be formally identified and granted a Recovery and Reflection permit and later a Temporary residence permission which confers a stamp 4 and access to social welfare. ***As a result of this policy, the vast number of detected victims of trafficking, whose experiences trigger anti human trafficking investigations remain in the RIA hostels for considerable periods of time (in some cases for years if they are in the asylum system), which has been a cause of concern for specialised Irish NGOs and international monitoring bodies alike.***

International evaluation of the present arrangements for accommodation

GRETA in its report¹¹ on Ireland's implementation of the CoE Convention urged the Irish authorities to 'review the policy of accommodating suspected victims of trafficking in accommodation centres for asylum seekers and to consider the setting up of specialised shelters for victims of trafficking, with the involvement of NGOs as support providers'¹². GRETA recommended that all victims regardless of their nationality, EU or Non-EU, were 'housed within a similar type setting, which is separate from the immigration system but rather responds to the abuse they have sustained'.¹³

Following a visit to the Baleskin reception centre in Dublin where the majority of the victims are accommodated, the GRETA delegates documented their concern that *'the centre not being a specialised facility for victims of trafficking, is not an appropriate environment for such victims on a number of accounts: mixing of men and women, which can expose vulnerable women to further grooming and exploitation; lack of privacy, victims sharing bedrooms with up to three other persons; difficulty to apply a personalised approach as staff may not be aware of who the victims of trafficking are; and possibility for traffickers to access victims'*.¹⁴

The Special Representative and Co-ordinator for Combatting Trafficking in Human Beings of the OSCE(SR) also visited Baleskin during her country visit in 2012 and expressed concern, suggesting the co-operation with NGOs to ensure appropriate and safe accommodation and assistance to trafficked

⁸ The issue of both permits is regulated by the Administrative Immigration Arrangements for the Protection of Victims of Trafficking

⁹ The annual statistics compiled by the AHTU (www.blueblindfold.gov.ie) show that in 2012, 48 victims of trafficking were detected, among whom 39 for sex trafficking. Similarly in 2011, out of a total of 57 victims 37 were cases of sex trafficking, and in 2010, out of a total of 78 victims, 56 represented sex trafficking cases. It must be noted that there was a significant number of minors among them – 19 in 2012, 8 in 2011 and 15 in 2010.

¹⁰ For example in 2012, while 4 people were pending identification, none was reported to be identified and granted Recovery and Reflection, and in 2011, 1 was identified and 3 were pending. www.blueblindfold.gov.ie

¹¹ GRETA Report Concerning the Implementation of the CoE Convention by Ireland (2013)

¹² Ibid p8

¹³ Ibid p48

¹⁴ Ibid p46

persons, taking also into account the need to prevent re-trafficking and further exploitation.¹⁵

Problems identified by the Irish specialist organisations

There are a number of reasons why the direct provision accommodation administered by RIA, which was originally conceived as a short term accommodation for individuals seeking international protection, is considered *inappropriate* for victims of trafficking. In particular, it is perceived as *substandard* by professionals working in the area of victims' support, with regard to women and children who have been trafficked for the purposes of sexual exploitation and have in many cases experienced severe trauma and human rights violations, including on Irish soil. Serious concerns with respect to the use of RIA for accommodation of victims of trafficking for sexual exploitation have been highlighted in a series of joint Irish NGOs submissions¹⁶ to NAP as well as in other independent reports¹⁷, which could be summarised as follows:

- The care for residents in RIA hostels is contracted to private operators, and the quality of care varies largely across the board.
- The RIA accommodation system is conceived without the necessary gender sensitivity, which is a recognised best approach to assisting trafficking victims, and is a specific requirement under the latest EU law (footnote reference to EU Directive 2011/36/EU)
- Victims have very little privacy to recover from often hugely traumatic experience such as multiple rapes; they have to share bedrooms with at least one and often two other strangers on rotation.
- The hostels are mixed gender and can leave already vulnerable young women with prior history of sexual abuse, open to further grooming and exploitation, which has been highlighted recently in the Irish media
- There is evidence that the RIA hostels are targeted by men looking to buy sexual services, and these men have propositioned women outside the hostels.
- Accounts given by victims indicate traffickers have used the asylum system for residency and accommodation while simultaneously trafficking victims.
- The RIA hostels are well known to the public and the victims could be easily traced and intimidated by their traffickers.

¹⁵ OSCE Special Representative and Co-Ordinator for Combatting Trafficking in Human Beings. Ireland Country Report 2013 SEC.GAL/246/12

¹⁶ Extract from the joint NGO(9) submission to NAP 2009: "The Government's provision of accommodation for trafficked persons in Reception and Integration Agency direct provision hostels for asylum seekers is completely **inadequate**. This option does not provide victims with the security and access to **appropriate** services they require. Furthermore, the lack of privacy and stability of the system is not appropriate for victims of trafficking and especially for those who are traumatized."

Extract from the joint NGO(8) submission to NAP 2010: "We continue to perceive the facilities of the direct provision centres as inadequate for the recovery and reflection of deeply traumatised individuals because of the lack of privacy, the lack of choice and comfort, and finally because of the considerable length of time suspected victims of trafficking have to spend there. A recent report prepared by Free Legal Advice Centres (2009) *One Size Doesn't Fit All: A legal Analysis of the Direct Provision and Dispersal System in Ireland*, 10 years on, highlights serious shortcomings in the system. The care for residents has been contracted out to private operators, and the quality of care varies largely across the board. It "needs substantial overhaul in order to meet the international human rights standards to which the state has committed itself before the community of nations" (p12).

¹⁷ Free Legal Advice Centres (2009) *"One Size Doesn't Fit All: A Legal Analysis of the Direct Provision and Dispersal System in Ireland, 10 years on"*; African and Migrant Women Network AkiDwa(2010) *"Am Only Saying It Now: Experiences of Women Seeking Asylum in Ireland"*; Ruhama: *Proposal on Safe Accommodation for Trafficked Victims* (Suggestions for Interim period until Support Structures Envisaged under the Immigration Bill 2007 are in Place)

- The dispersal policy can result in re-locating victims to any part of the country, consequently, removing them from their established support network.
- Long-term hostel residence hinders victims' recovery process and compounds mental health issues.
- Direct provision hostels do not allow victims to control their basic daily functions including food intake, clothing and toiletries. Suspected victims have reported it is difficult to eat the food provided and consequently, they have very little comfort or nutrition.¹⁸
- The lack of finance limits victims' options on how to spend their almost unlimited free time and their ability to form basic friendships with people outside the hostels.
- Living long term in hostels severely impacts on the rights of victims of trafficking to integrate into the community and to achieve any degree of social recovery.
- Due to the lengthy asylum process, victims of trafficking claiming international protection are accommodated for two to four years in RIA hostels, while the investigation of the crime against them is in progress and their evidence vital.
- Victims of trafficking in the asylum process are denied access to vocational training and other education and employment options during the lengthy asylum process.
- European Economic Area (EEA) victims of trafficking rarely satisfy the Habitual Residency Condition (HRC) and their options provided by the State are limited to Direct Provision hostels, homelessness or voluntary repatriation.

Proposed solutions

Considerations of new improved arrangements for accommodation would be very welcome and timely, in view of the fact that a new National Action Plan on Human Trafficking is being drafted at present and is due to be launched for consultations shortly, according to information from the AHTU.

The following proposal offers practical recommendations for the delivery of adequate accommodation to victims of trafficking who are awaiting formal identification, while recovering from their ordeal.

Internationally, there are various models of accommodation for victims of trafficking for sexual exploitation. One such model is the 'centralised' type, which involves the designation of a 'safe house', which is usually a single sex accommodation to which all detected victims are transferred and where they await their formal identification as suspected victims of trafficking from the moment of their rescue/escape. Another example of the approach to accommodation which is used in some European countries with well-developed women shelter systems, would be the allow victims of trafficking to use such decentralised shelters on par with resident victims of domestic and other gender-based violence. The International Organisation For Adolescents (IOFA) in their global assessment of shelters found that 44% of shelters worldwide accommodate trafficked victims exclusively while 56% are mixed shelters, where trafficked victims are mixed primarily with victims of domestic violence.¹⁹ A USAID report in 2007 stated that parallel accommodation shelters may not always be viable due to budget considerations and that VoT will most likely be mixed with victims of DV when they can not be accommodated exclusively.²⁰

The present proposal endorses the *decentralised combined principle of accommodation*, where

¹⁸ Asylum seekers live in large mixed gender hostels (or caravan camps), they are served food three times a day in a canteen on the premises, and they are being given €19.10/week for private expenses. This system is called Direct Provision

¹⁹ IOFA (2004) Preliminary Global Assessment of Shelters serving Victims of Human Trafficking

²⁰ Rosenberg R (2007) Shelter Assessment of BiH USAID

detected victims could avail of a range of accommodation types, such as shelters, specifically rented units, using a small portion of the capacity of housing providers who specialise in supported safe housing for vulnerable women and young people. The rationale for this preference can be summarised in the following way:

This approach offers more flexibility in accommodation of victims with different profile, i.e. single women, women with children and aged out minors. It also offers a better guarantee of confidentiality and security, in view of the stigma associated with trafficking for commercial sexual exploitation and the potential risks to their safety on the part of traffickers and pimps who'd be aware of the evidence the victim could provide on their crimes. This approach also better protects against the phenomenon known as 'contamination of testimonies', which occurs when potential witnesses are placed together after having been subjected to the same(similar) abuse, on the hand of the same criminal gang for example. Not in the last place, the decentralised approach offers better privacy to the residents.

With respect to its concept and implementation, the recommended model utilises existing competence and resources in Ireland and supports the enhanced cooperation between State and non-governmental service providers in ensuring the recovery of the victims of human trafficking and their preparation as potential witnesses. As the US State Department Trafficking in Persons international report stresses out, when the right balance is struck 'everyone wins, the State, the victim and society - as the victim finds his or her voice and an exploiter is rendered speechless as justice is handed down'(2007).

The proposed decentralised approach to accommodation of victims of trafficking using various types of accommodation could include:

A) Short term emergency accommodation

This involves access to certain women's refuges for short term emergency accommodation of victims in Dublin, Cork and Limerick (a designated shelter per residential area), i.e. Sonas Domestic Violence Charity's Refuge "Viva house" in Dublin. This type of accommodation is very secure, while the personnel have a significant competence in dealing with women who have experienced trauma and abuse. It could be reasonable to use such a refuge for a short-term emergency accommodation of victims who have been saved during a brothel raid for example. Such shelters are usually funded by the Child and Family Agency and the relevant local authorities where the shelter is based. Presently, the only possibility for emergency accommodation outside of RIA hostels, following a raid in brothel for example, could be provided by Ruhama who in some cases could accommodate for up to two weeks but their resources are limited. We would submit that unlike RIA hostels, which are not suitable or sufficiently secure to cater for the needs of a deeply traumatised individual (a repeatedly raped woman for example), the experienced women's refuges in Ireland could play successfully the function of a first safe location for a limited period of time.

B) Dispersed addresses around the country

This involves a number of properties (apartments or houses) with dispersed locations around Dublin and other bigger Irish cities, such as Cork and Limerick with outreach support by a specialised service provider.

Presently for example, some local authorities provide properties and Sonas²¹ Domestic Violence Charity delivers outreach support services. The current scheme which Sonas has in Dun Laoighre Rathdown local authority area allows 3 months residency for the victim. This model brings together An Garda Síochána, the Child and Family Agency, the service provider (in this case Sonas) and the housing provider,

²¹ Sonas Housing participated in one of the first EU funded anti-trafficking projects in Ireland along with An Garda Síochána, the DJE and the HSE, which was led by the Immigrant Council of Ireland "Dignity: Working together to deliver quality services to victims of human trafficking" (2008-2010).

namely the local authority.

Such partnerships for accommodation of victims of trafficking for a duration of 3 or more months could be organised in collaboration between An Garda Síochána, the local authorities and a specialised support provider who could provide service on outreach basis. In all of the bigger towns in Ireland, there is at least one specialised NGO, which could contribute to such task-forces to the benefit of victims and the investigations. These arrangements are flexible, cost-efficient, beneficial for the victim's recovery in anonymity, privacy and support, and also a welcome practice of partnership between the State, the local authorities and non-governmental organisations.

C) Longer term supported housing units

This involves 3-5 or more units in supported accommodation offering housing for one or more years, in cases of extremely vulnerable victims who are not ready for privately rented accommodation without on-site support. Focus Ireland is an established serviced provider in Ireland that specialises in supported accommodation for vulnerable residents. Their hostel for supported accommodation of young homeless people is an example of best practice of facilitation the transition to independent life for young people who as minors had not had a chance to mature in normal environment. In many cases, victims of trafficking for sexual exploitation are former children who have aged out within abuse and misery and for them a privately rented apartment, albeit with outreach support, would not offer the necessary protection and guidance towards independent living. On the other hand the intense, onsite support could give these particular victims a real chance for recovery and social reintegration.

Additional considerations

While RIA accommodation is viewed as unsuitable for victims of trafficking, in particular for women who have been sexually exploited, there is a range of RIA-associated services that are essential for victims and should not be discontinued due to the changed accommodation arrangements. Examples of this are medical and psychological care and material assistance. Possible solution to these problems could be provided by issuing temporary medical cards to such victims and facilitating a social welfare payment.

The habitual residency condition presents a hurdle for social welfare payments for many victims of trafficking including EU citizens and applicants for refugee status or subsidiary protection. It is recommended that all victims of trafficking, once regarded as a potential victim, receives emergency payments, thus overriding the habitual residency criteria while awaiting a decision on whether there are reasonable grounds for believing they are victims of trafficking.

It is further recommended that once identified as a suspected victim, who is willing to cooperate with the authorities in the investigation and/or prosecution of the offences committed against them, every victim should be granted a temporary permission permit which carries a Stamp 4 and thus generally facilitates access to social welfare. Where shelters in the past have accommodated a victim of trafficking for emergency reasons, they have explained that the baseline per day payment received for Irish citizens is not paid where the person is not habitual residence compliant and thus they have not been able to continue their service. We therefore recommend that the guidelines for deciding officers for determining habitual residence be amended to include victims of trafficking of all nationalities, including victims who have a pending application for refugee status or subsidiary protection, as a group who do not need to be HRC compliant.

There are appropriate and experienced accommodation service providers in the State for vulnerable groups. Victims of trafficking should also be considered a vulnerable group in need of safe and appropriate accommodation. Most States take a baseline approach to costing, namely a **cost per unit** or **cost per victim of trafficking per night** for their shelters.

Specialised service providers, often charities or NGOs run the shelters in many EU countries. The

providers are funded by the government to provide such accommodation and often through a tendering process. The Immigrant Council of Ireland has looked at some examples of other EU countries. In the UK the Poppy Project supports approximately 50 women across the country at any one time. In Northern Ireland the network of Women's Aid shelters is funded to accommodate victims of trafficking. The German government, Belgian government, Italian government, Czech government and Romanian government all fund NGOs to provide suitable accommodation. Such funding could continue to come from the budget for asylum, substituting RIA accommodation cost per unit for a shelter cost per unit. Material costs, medical cards and further assistance as stated previously could then be granted through the amendment of the HRC guidelines granting the victim access to social welfare where they are considered a suspected victim of trafficking awaiting formal identification and assisting An Garda Síochána. The term victim of trafficking should cover EU victims, non-EU victims and those pursuing their right to also apply for asylum concurrently.²²

The proposal is endorsed by the following parties:

Immigrant Council of Ireland

NASC

Focus Ireland

Sonas Domestic Violence Charity

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²² See accompanying submission on victims of trafficking in the asylum process